

Exhibit L

David Lynch

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
DAVID LYNCH**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

DAVID LYNCH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6 South Greenleaf Avenue, Staten Island, New York 10314.

2. I am currently 42 years old, having been born on March 4, 1980.

3. I am the son of Joseph W. Lynch, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on June 27, 2012, at age 61. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father had a significant involvement in my upbringing. As a family, we were all close and individually, I had a great relationship with him. He loved to be outdoors, spent a lot of time in the park. We did a lot of biking together. He loved to entertain. My father loved bringing the family together, whether it was a small dinner or a barbeque with extended family and friends. We'd all get together for Easter or Mothers' Day, and my dad made sure everyone

had a seat at the table.

6. My father was also very handy. He was great with building and fixing things. He loved helping family, friends, and neighbors. It gave him great pleasure. He was always doing something, whether it was recreational or helping us kids once we moved out. I remember he helped me move into my first apartment. I was in the middle of buying a home when he started to get sick, but it was a project we were looking forward to doing together. He would lend a hand to anyone just to keep busy. He made sure all our houses were always in very good shape.

7. My dad worked for the Staten Island Ferry and was working on September 11, 2001. The ferry workers were called in as first responders. He transported bodies and limbs from Ground Zero to Staten Island. I remember that he was given special gear to work on the pile. He had a hard-hat he'd take to work each day. I don't recall how long this continued, but he was definitely on the front lines. It was at least weeks, if not months. On 9/11, I worked downtown as an intern, and my office was shut down. I was concerned about whether I was going to get more work, so my dad encouraged me to go to the Department of Transportation's office and apply for a job. That's how strong his work ethic was.

8. My parents told me that my dad was sick. I don't remember the conversation, other than that he had lung cancer. But they said it was caught early, and he was going to get treatment and get better. The plan was for my dad to get chemotherapy before surgery to remove the tumor. Usually, they do the surgery first, but they wanted to start with the chemotherapy. The hope was that it would shrink the tumor as much as possible, before surgically removing it from his lung. I was very optimistic about his prognosis and recovery, particularly because my dad had always been in such good shape and physically active. As soon as the chemotherapy sessions started, however, it was like a roller-coaster. He'd had a terrible negative reaction to the chemotherapy drugs. It was the chemo itself that almost killed him, not the cancer. I mean, within weeks, literally weeks later, he was on his deathbed being rushed to the hospital. It was such a stressful time for all of us. I remember one time, my brothers and I almost got into a fistfight. I couldn't even tell you what it was about, but that was the level of tension we were all under, while my dad was in the hospital fighting for his life as a result of the chemotherapy.

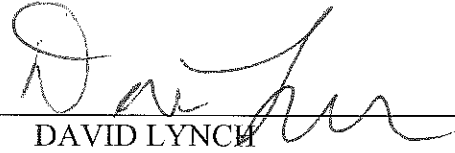
9. Thankfully, my dad made it through that period. His case worker wanted my dad to go to an inpatient rehabilitation facility, to get his strength back. He was very weak after the treatment. I was lucky that I was working at NYU Langone Medical Center. They had a very

good rehab facility, and I was able to convince them to take my dad. I can't tell you what a blessing that was for my dad. It was as if he went from almost going in the grave, to a man that actually had a chance at life, again. Mentally, the fact that he was out of the hospital bed and taking an active role in his recovery gave him hope and motivated him to fight. I think the mental and emotional impact of the rehabilitation did more to improve his overall attitude than what it was able to achieve physically. He did get stronger, but he was still extremely weak. He could walk a little bit and climb a few stairs, but that was about it. Things went south very quickly.

10. At this point, he was back and forth between home and the hospital, and his condition just spiraled downward. He would sleep all day and be awake all night. He started falling when he tried to walk. My dad, this big strong, no-nonsense guy, was lying on the floor and couldn't get himself up. My mom would try to lift him, but she couldn't pick him up. My brothers and I would have to run over to their house, just to pick him up off the floor. That's got to be embarrassing for him, as a man, you know. Literally, not being able to pick yourself off the ground. It was very sad, and you could see he started losing hope. During the months that my dad worked to recover from the chemotherapy treatments, the lung cancer had spread. I remember when my dad told us he wasn't going to continue with any more treatments. Surgery was pointless. The doctors had mentioned radiation treatment, and my dad wanted to have it. But, after they saw how advanced the cancer had gotten, the doctors took away that option. That really crushed my dad. That's a tough conversation to hear from your father. That he's dying and he had accepted the fact that he's dying.

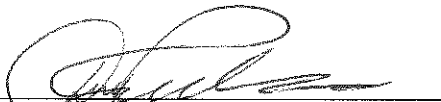
11. My father came from the school of tough love. I would go to him for guidance or advice, but not as often as I should have, looking back. I wish I'd asked for his advice when I had the chance. Before he got sick, I was debating whether or not to get married. My brother was planning a wedding of his own, and it was just a very emotionally charged time for me. Once my dad got sick, obviously, he wasn't well enough to give the same kind of guidance or advice. Because of the emotional toll of my dad being sick, I was overwhelmed, and I didn't necessarily make the best decisions. I got married, but we went through a rough divorce a couple of years after my dad died. What took me by surprise is how much I missed him. I was going through my divorce. That's the first time I realized how much I needed my dad. It was a time in my life that I was really kind of losing it and probably the time I needed my dad the most. He was a very pragmatic guy, straightforward, which is exactly what I needed at the time. I might not have

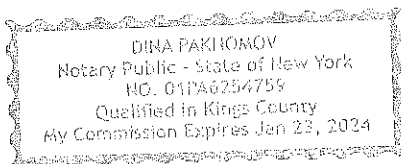
appreciated my dad's approach to problem solving before that point. That was the first time in my life that I knew I needed my dad. I was very volatile and emotional, kind of a wreck. I think my dad could have set me straight, and I might have avoided a lot of heartache. My dad's death had a significant effect on me and my family.


DAVID LYNCH

Sworn to before me this

21 day of July, 2022


Notary Public



Mary Lynch

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

AFFIDAVIT OF
MARY LYNCH

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

MARY LYNCH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 350 Richmond Terrace, Apartment 2T, Staten Island, New York 10301.

2. I am currently 69 years old, having been born on November 20, 1952.

3. I am the wife of Joseph W. Lynch, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lung cancer on June 27, 2012, at age 61. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Joseph and I did pretty much everything together. We both worked only until three o'clock, so as the kids got older, we had a lot of free time. When the weather was warm, we enjoyed riding our bikes in various places, including in the city, Riis Park and the Rockaways. Regardless of the weather, we enjoyed taking long walks in Clove Lakes Park and going to the theatre. We had saved some money and were planning to do some traveling, but Joe got sick.

Joseph was a very good father. He was able to quickly identify and find solutions to simple problems. He was very clever and handy. Joe taught our children to be independent. He taught them to how ride and fix their bikes. He also taught them how to drive. Joe was involved with our kids' sporting activities, like Little League and basketball, and would attend as many games as possible.

6. Joe worked on the Staten Island Ferry for over 20 years. On 9/11, he was working as a deckhand when the attacks on the World Trade Center began. His ferry had just left Manhattan and was closer to Staten Island at the time. The smoke and fire were visible from the ferry. The Department of Transportation had closed all roadways and bridges, so the decision was made to keep the ferry running so that people could get off of Manhattan and back on to Staten Island to get home. Joe took quite a few trips back and forth to Manhattan that day and witnessed many people covered from head to toe in the ash and dust from the fallen towers. He described to me how people were in a state of shock and almost zombie-like as they got onto the ferry. The entire scene was surreal. Joe was really affected by what he saw that day. After September 11th, the ferry service was suspended, and the ferries were being used to transport human remains and body parts from Ground Zero to the Staten Island landfill, where they would be held for identification. The ferries were also being used to transport debris and damaged vehicles to the landfill, as well as to bring equipment, supplies and machinery to Ground Zero. Joe was on many of those trips. At some point, Joe was on the bucket brigade and part of the recovery efforts until regular ferry service resumed.

7. Joe started to develop breathing issues, and I noticed that he was losing stamina and strength during his bike rides. As a first responder, he was part of the World Trade Center Health Program at Mount Sinai. He went for a check-up in January 2011, and he told the doctor he thought there might be a problem with his heart. His heart was fine, but the doctor saw a spot on one of his lungs which was concerning. That doctor at Mount Sinai booked an appointment for Joe to see an oncologist at Sloan Kettering Memorial Cancer Center immediately. They determined the spot on his lung was cancerous. It was Stage II, and the doctors were optimistic that they could remove the cancer.

8. The doctors recommended Joe have chemotherapy to shrink the tumor before they did surgery. Joe had a very rare, almost deadly reaction to the chemotherapy after only two

treatments. He developed sepsis and was admitted to the hospital. He had painful sores all over his body. He couldn't eat for a month. The doctors tried to insert a feeding tube, but anything they tried to insert into his body caused another infection. Joe spent a month in the hospital, and he almost died from the chemotherapy treatment. No one expected such a massive complication.

9. Joe wasn't ready to give up. Even his doctor said he'd never seen a patient fight so hard to live. As rare as it was for patients to have a negative reaction to the chemotherapy that Joe had, it was just as rare that they survived. Joe was accepted into a rehabilitation program at NYU Langone. He worked very hard to get his strength back. He was very regimented when we got home. Every hour, he would walk from our apartment to the elevator. We were working together to get him stronger. We had hope.

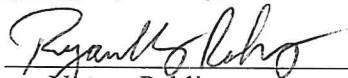
10. Joe was a strong guy. He did everything he was told, as a first responder and as a patient. I was so angry when his condition began to get worse again. There are lots of evil people in the living in the world, and Joe was a good person. He didn't deserve this. We couldn't begin to deal with the cancer until Joe was healthy again. He came home but was in and out of the hospital for a couple of months. His strength did improve, and he got better, but not enough. The doctors administered a different type of chemotherapy, but Joe did not respond well to this one, either. So much time had gone by that the cancer had started to spread again. It was too late for surgery or even radiation. He had been through so much, already. He was weak. His muscles had atrophied. He tried to stay positive, but even after working so hard, the cancer was too advanced to be treated. I was devastated. Joe became depressed, and it was very hard to stay positive because he had come so far and now, he was dying from what was supposed to be a treatable cancer. He died on June 27, 2012.

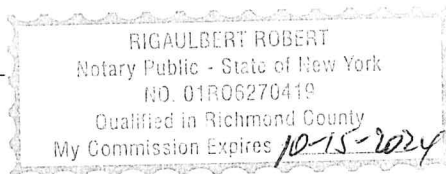
11. A lot of people depended on Joe, not just me and the kids. He liked helping people and being needed. Whether it was my sisters or his friends or just people in the neighborhood, they would go to Joe when they needed help. He could fix almost anything, but he was also a very bright light. He was a funny, loving person who people wanted to be around. His death was a huge loss to many people. He never met any of his grandchildren. I see other couples our age traveling and having fun together, and I don't get to have that time with him. I went on a biking trip to Amsterdam and saw all these couples our age biking together and having fun sharing the experience. I was alone. I didn't have a husband anymore, and all I could think of

was how much Joe would have enjoyed it. I feel like my husband and I were robbed of the rest of our lives together.


MARY LYNCH

Sworn to before me this
14 day of July, 2022


Notary Public



Peter Lynch

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
PETER LYNCH**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF RICHMOND)

PETER LYNCH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 36 Hamilton Avenue, Apartment LL, Staten Island, New York 10301.

2. I am currently 43 years old, having been born on March 13, 1979.

3. I am the son of Joseph W. Lynch, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on June 27, 2012, at age 61. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was a great guy. He always took care of the family and made sure we were happy. We'd go on vacations, nothing fancy, but we always had fun. My dad and I had a close relationship. I lived with my parents for a long time. When I moved out, I stayed nearby and would see them every weekend. I'd see them at least once a week. My dad really made a good life for our family.

6. My dad was part of the rescue and recovery efforts in the immediate aftermath of the attacks. He worked on the Staten Island Ferry, and he would transport remains and belongings from Ground Zero to Staten Island, for identification. In addition, he worked on the bucket-brigade at Ground Zero.

7. It was very difficult when he got sick. I wasn't expecting it. I could tell he was in very bad shape. My mom told me that he went to get a regular check-up, and they found the cancer. It was a surprise because they found it during a routine medical examination. He wasn't showing any symptoms before the diagnosis.

8. My dad had chemotherapy, and things really declined from there. It ruined his body.

9. Emotionally, it was very difficult for my brothers, mom and me. He needed someone to be around him 24/7. It was a very long, agonizing process. It was rough. I used to visit him in the hospital. The sad part was that my dad wasn't able to speak or do very much. It was just agonizing. It wasn't a good time. My dad's health declined rapidly.

10. After my dad passed, I was worried about my mom living alone. I went and spent some time with her to make sure she was doing okay. Personally, for me it was rough. I started drinking alcohol excessively. Alcoholism runs in our family, and it's been a constant struggle. I miss my father. His illness and death took a toll on the entire family. I wish I were stronger at the time and handled it differently. My brothers, thank God, handled it better than I did. I respected my dad and wish I didn't lose him so soon. Now that he's gone, it's taken a toll on my life that I couldn't have imagined.

New York County - NY State

Sworn to before me this

18 day of July, 2022

Notary Public

PETER LYNCH

TAREK M ELBARKATAWY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01EL6413650
Qualified in New York County
My Commission Expires 02-01-2025

Daniella Lemos Machado

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

AFFIDAVIT OF
DANIELLA LEMOS MACHADO

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)

: SS.:

COUNTY OF PUTNAM)

DANIELLA LEMOS MACHADO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 82 Vista Terrace, Mahopac, New York 10541.

2. I am currently 21 years old, having been born on December 4, 2000.

3. I am the daughter of Alberto Machado, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic carcinoma of the inguinal lymph nodes on October 6, 2011, at the age of 54. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I had a close relationship. He was close to all three of his daughters since we are triplets. My dad was very dependable. Whenever I had a problem or a question about anything, I went to him for advice. He taught me simple things like learning how to whistle and snap my fingers. I loved to play with him when he was home. He always tried to teach us all of the things that he knew. Before I knew my dad was sick, I was interested in

playing the violin, and he and my mom bought me my first violin. It still means the world to me. My dad always taught me to keep going, even if I had trouble in school. He taught my sisters and me how to try to solve any problems we might have. I am currently studying pre-medicine with a double major in biology and statistics. My dad greatly influenced my love for the sciences and taught me to be intuitive and learn as much as possible.

6. On 9/11, I was only nine months old, so I had no first-hand knowledge. My mom told my sisters and me that my dad was a construction worker working within a block or two of the World Trade Center. He had finished work but was called back to assist with cleaning the debris and getting people out from under the rubble. He did this for several weeks. It was very traumatic for him to see the aftermath of what had occurred.

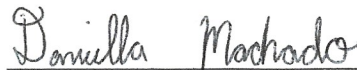
7. Before his diagnosis, my dad had a lot of abdominal pain. Every time he ate, he would have to vomit. I remember sometimes waking up and not seeing my parents when I got downstairs. I'd see blood stains in the bathroom and know that they probably had to go to the hospital with my dad. I remember being fearful that they wouldn't return and hoping it wasn't the last time I would see them again—something a ten-year-old should not have to think about. When he started chemotherapy, I knew he had been diagnosed with cancer. Still, my sisters and I didn't understand how bad it was until he became gaunt and weak and had to be admitted to the hospital, where everything worsened. The day after my dad had surgery and had the colostomy bag, we asked him what it was, and he showed us the scar. It was so hard to see my dad so weak, his skin stitched up, and the bag hanging from him. As young as we were, we knew this wasn't normal for someone who should have been healthy. It was difficult to see my dad in so much pain and not able to move well. My sisters and I would walk around the hospital with him so he could get some movement. After a while, he became weaker and weaker, and slower and slower, until he couldn't get out of bed. My mom, sisters, and I spent every day in the hospital with my dad, except for one day. My sisters and I would go straight from school and have to do our homework there. We would give my dad ice chips to suck on when he couldn't eat. We each acted like we were his nurses since there wasn't much else for us to do.

8. Seeing my dad so sick had an extreme impact on me. Each day we left the hospital after being there the entire day, I feared that something would happen to him, and I wouldn't be there and would never see him again. I became anxious about losing anyone else

because it had always been just the five of us. We had no other family here. I worry to this day about something happening to my mom or sisters when I'm not there. Emotionally, I'm always fearful of losing someone else in my family. I remember vividly the day my father died. Instead of getting ready for school that morning, we had to go to the hospital. He was having difficulty breathing, and his organs were shutting down. The nurse told us that he was holding on to life until we got there. We walked into the room; he opened his eyes and looked at us for the last time, closed his eyes, and died. It seemed as though he wanted to say something to us before he died, but he didn't have the strength. All he could do was look at us one last time, and then he couldn't hold on anymore. My sisters and I will never forget it. It is unimaginably the hardest thing for ten-year-olds to go through.

9. Since my mom didn't speak English, she depended on my sisters and me to translate everything for her after my dad passed away. We were forced at a very young age to think about finances and other things we really didn't understand. We had no other family other than each other that we could depend on.

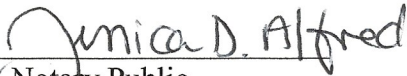
10. My dad's illness was the inspiration for my path to pre-medicine and wanting to be a doctor. I have a desire to be useful and help others who may suffer the same way my dad did and hopefully make a difference, so they don't have to suffer as much. I miss my dad every day and hope he is proud of my sisters and me and how much our short time with him inspired us.



DANIELLA LEMOS MACHADO

Sworn to before me this

12 day of July, 2022



Notary Public

JESSICA D. ALFRED
Notary Public, State of New York
No. 01AL6145789
Qualified in Putnam County
Commission Expires 05/15/2026

Jessica Lemos Machado

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

AFFIDAVIT OF
JESSICA LEMOS MACHADO

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF PUTNAM)

JESSICA LEMOS MACHADO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 82 Vista Terrace, Mahopac, New York 10541.

2. I am currently 21 years old, having been born on December 4, 2000.

3. I am the daughter of Alberto Machado, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic carcinoma of the inguinal lymph nodes on October 6, 2011, at the age of 54. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was only ten years old when my father passed away, but he and I were very close. My sisters and I are triplets, and my father was very involved in our lives. He always provided for us and made sure we had everything we needed. I enjoyed spending time with my father when he was home from work. We liked watching television programs like Animal Planet or learning about the world. We had similar interests in that regard, and I believe that had a

significant impact on my life and things I found interesting. My father taught me a lot about the world. I remember vividly going to the zoo and having him describe the animals. He encouraged me to do well in school. He worked hard to provide for us and taught me to have a good work ethic while in school. That inspired me to do well. It's hard to remember since I was so young, but I vaguely remember speaking to him about the future and what I wanted to be when I grew up. He inspired me to do well in science, which I liked, and study hard. He tried to teach me how the world works through science. Even though there was a lot I didn't understand at ten years old, his words influenced me because now I am in college, majoring in biology with a minor in psychology. I'm sure he would be proud of that.

6. I was only nine months old on 9/11, so I have no recollection of it. However, my mom told us that she received a call from a friend that morning about what was happening, and she turned on the TV. My father had been working in that area and saw the second plane hit the building. He had been leaving work but received a call to go back and help with the cleanup. He went back and forth to the area for several weeks.

7. When my dad became ill, I was very young, and he tried not to let his illness show to my sisters and me. He would mostly complain to my mom about any symptoms he was having. We eventually learned that he was having pain in his abdomen, went to the doctor, and was diagnosed with cancer. We knew he was sick, but it was hard to understand at that time what it meant. As his illness progressed, we could see that he was getting sicker and witnessed him throwing up and losing weight due to the chemo. We visited him in the hospital every day that he was there, except once when his immune system was so compromised that the doctors advised us not to visit him. so he didn't risk catching anything from us. When we weren't in school, we were at the hospital and would do our homework there. Seeing my dad in such bad shape was difficult, but at least we were there with him. However, being ten years old, it was hard not to have a chance to play or do things I did before. All I could do was watch my dad be so sick and get treatment.

8. My dad's illness was difficult for me. I always saw my dad as strong and a fighter. It was hard for me to see him in pain and keep getting thinner and being so different than he had been before. I believed that he would get better and get through it. He was my dad, and I couldn't even imagine that he wouldn't be with us. Once he passed away, I became worried

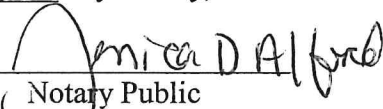
about what we were going to do because we had no other family here to help us. I became fearful of something happening to my mom, and then there would just be me and my sisters alone. I didn't like thinking about that, but it was a possibility.

9. I was in 5th grade when my dad passed away. He didn't get to see my elementary school graduation and won't be here for whatever I experience in the future. I hope he is proud of me and all that I've accomplished so far, but there's no way to really know that. His death inspired me to continue with biology to understand what his body went through and what he experienced during his illness.

10. I wish I could have had more happy years with my father, doing many more father-daughter things and continuing to learn from him. Losing him when I was just ten years old was so tragic. I miss my dad every day.


JESSICA LEMOS MACHADO

Sworn to before me this
12 day of July, 2022


Notary Public

JESSICA D. ALFRED
Notary Public, State of New York
No. 01AL6145789
Qualified in Putnam County
Commission Expires 05/15/2026

Leanna Lemos Machado

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEANNA LEMOS MACHADO

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW YORK)
 : SS.:
COUNTY OF PUTNAM)

LEANNA LEMOS MACHADO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 82 Vista Terrace, Mahopac, New York 10541.

2. I am currently 21 years old, having been born on December 4, 2000.

3. I am the daughter of Alberto Machado, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic carcinoma of the inguinal lymph nodes on October 6, 2011, at the age of 54. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad and I had a great relationship. When he wasn't working, he spent a lot of time with my sisters and me. I always felt loved and provided for. My dad was proud and passionate about having triplet daughters. Even when he was so sick in the hospital, he would show the nurses pictures of us as babies. My dad taught me about many things. We enjoyed watching television programs like Animal Planet or learning about the world. I remember vividly

going to the zoo and having him describe the animals. He made everything interesting and piqued my interest in science. He inspired my sisters and me to work hard and be open to anything we were able to learn. He also encouraged us to do well in school. Even when he was sick, my sisters and I continued to do well in school because we felt it was the least we could do for him. Growing up, I wanted to be a doctor and a veterinarian at the same time. He encouraged me to learn everything I could. I am currently in college studying computer science with a minor in biology. I wish I could know how he feels about my life's path and how far his guidance has taken me, even though I was only ten years old when he passed away.

6. I was only nine months old on 9/11, so I have no recollection of it. However, my mom told us that she received a call from a friend that morning about what was happening, and she turned on the TV. My father had been working in that area and saw the second plane hit the building. It's scary to think that he was so close to everything that was happening at that time. He had been leaving work but received a call to go back and help with the cleanup. Everyone else was leaving the scene, but he had to return in the midst of the tragedy. He went back and forth to the area for several weeks. Sometimes, I am proud of him and feel he was a hero for going back, but then I realize that it caused him to get sick. That causes me to have mixed feelings about it. All he went through could have been avoided if 9/11 had never happened.

7. I remember knowing something was wrong with my dad when I started to witness him throwing up and having nosebleeds. He could barely eat, and when he did, he would feel sick and have to vomit. Even though we were very young, my sisters and I became concerned because we knew that things like that were not normal. We didn't really know what cancer was, but we knew it was bad. As it became more evident that he was getting sicker, I became scared and anxious because I feared the worst-case scenario. I had only two thoughts in my head at that time—my schoolwork and whether my dad would be okay. That took a toll on my daily life.

8. I remember a specific day during my dad's illness that greatly impacted me. Since my dad was losing his hair to chemotherapy, he decided to shave his head. My mom called my sisters and me together, and my dad was sitting in the room wearing a hat. They explained to us that they had to show us something. He took off his hat, and he was bald. It was kind of shocking to me. I remember feeling so sad and crying myself to sleep that night because I knew things were not good. I was only ten years old, but I remember it so vividly.

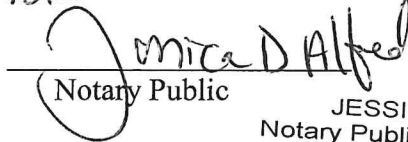
9. I was too young to understand anything about finances when my dad passed away, but I know that my mother was left to take care of everything. My father was the sole provider, and now it was up to her to figure out how everything would get paid. She took a job cleaning houses while we were in school so she could be home with us after school. At the time, my sisters and I didn't understand how difficult this was for her. We have a much better appreciation for it now.

10. Before my dad became ill, my sisters and I talked to him about the future. We joked that since we have the same birthday, we would have a big Sweet 16 party and that he would have to dance three times, once with each of us. Since that dream could never come true, when we turned 16, we opted not to have a party and to simply go out to eat. I think that hurt all of us in our own way. My dad wasn't there for any of my graduations. He'll never walk me down the aisle or meet any future grandchildren he may have. He won't see any of the life events I will have. I'll never be able to seek his guidance or advice. I often wonder how life would be different if he were still here. That takes up many of my thoughts. I think of being helpless to do anything for him when he was going through his illness and in so much pain. They say time heals all wounds, but it doesn't. Not everything anyway. I feel I was cheated out of so much time I could have spent with him. I miss my dad every day and hope he is proud of my sisters and me.


LEANNA LEMOS MACHADO

Sworn to before me this

12 day of July, 2022


Notary Public

JESSICA D. ALFRED
Notary Public, State of New York
No. 01AL6145789
Qualified in Putnam County
Commission Expires 05/15/2026

Maria Machado

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

AFFIDAVIT OF
MARIA MACHADO

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF PUTNAM)

MARIA MACHADO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 82 Vista Terrace, Mahopac, New York 10541.

2. I am currently 60 years old, having been born on November 3, 1961.

3. I am the wife of Alberto Machado, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from Stage IV metastatic carcinoma of the inguinal lymph nodes on October 6, 2011, at the age of 54. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Alberto and I had a good relationship. We enjoyed visiting different places, especially when our daughters, who are triplets, were young. We would go into the city and take them to the zoo. Most of our family is still in Portugal, so our family gatherings consisted of

Alberto, me, and our three children. Alberto was a good and devoted father. He was very dependable and would do anything for his family.

6. On 9/11, Alberto was a construction worker and was called in after the towers fell to help with the cleanup. He continued to assist with the cleanup for several weeks. He told me that, when they would move items or debris, there was always more dust and debris underneath. He was provided with a mask, but it was not the best quality, and he would often have to change it.

7. My husband had always been a healthy man. In October 2010, he started feeling pain in his lower abdomen. He went to a doctor and was referred for a sonogram, which showed that his lymph nodes were enlarged. A CT scan was performed which confirmed that he had Stage IV cancer. He had a course of chemotherapy treatments. The tumor in his lymph nodes was blocking his intestines and stomach. He underwent surgery and required a urostomy pouch. Due to the tumor, it was difficult for him to eat, and he had to be fed intravenously. Fluids were building up in his lungs, which had to be drained out. This procedure was painful for my husband since little to no anesthesia was administered.

8. My husband's illness was one of the worst experiences of my life. I stayed in the hospital with him every day and night, watching him suffer in constant pain. I had no family here in the United States to help me. I felt all alone and would often break down in tears. Since I had no one to take care of my three young daughters, I had to bring them to the hospital with me to be with my husband. I worried about how seeing their father like this affected them. It broke my heart. I had to be strong for them but suffered a lot of anxiety about how we would get by if Alberto died. He was the sole provider for the family before becoming ill. Once he became sick, I became his full-time caregiver. We used any money we had, including maxing out credit cards, to pay for my husband's treatment.

9. Alberto's death left me alone with no one to help me take care of my children. I lost my companion, and my girls lost their father. They were only 10 years old. I had no desire to go places anymore. My only focus was providing for my girls and helping them get through this terrible time. Alberto was a loving and devoted father, and I knew that my girls were heartbroken and scared. My husband was a good man. His death was a devastating loss to us,

and we will always miss him.

Maria Machado
MARIA MACHADO

Sworn to before me this
12 day of July, 2022

Jessica D. Alfred
Notary Public

JESSICA D. ALFRED
Notary Public, State of New York
No. 01AL6145789
Qualified in Putnam County
Commission Expires 05/15/2026

Linda MacMenamie

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
LINDA MacMENAMIE**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)
 : SS.:
COUNTY OF SUMTER)

LINDA MacMENAMIE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 10393 Silver Maple Avenue, Oxford, Florida 34484.

2. I am currently 58 years old, having been born on August 4, 1963.

3. I am the wife of Duane F. MacMenamie, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from myelofibrosis on July 30, 2015, at the age of 59. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My husband Duane and I had a very loving relationship. We were always doing things together. We were quite social. He was very handy and enjoyed doing construction projects on our home. He was a great listener and problem solver. Duane was my “go to” guy.

6. My husband was a union representative for New York City Transit Authority workers. During the World Trade Center attacks, the president of Duane’s union asked him to

only walk short distances. I remember his last winter we had a bad snowstorm. Duane went outside and started shoveling snow. I made him stop shoveling, which broke my heart. It was very hard for Duane to accept that he couldn't do the things he used to. I hated to police him and have to tell him what he shouldn't be doing. During all this, his sister passed away from cancer and then my father died. I had to take a leave of absence from work.

12. The stem-cell transplant surgery was performed in June of 2015. The transplant was successful, and Duane was doing well. The doctors were going to release my husband from the hospital, but when I went to see him, he was having a very hard time catching his breath. He could hardly speak, and I told him to write down what he needed to say so he didn't have to talk. Something was wrong with his lungs. He was taken to the ICU. He had to be sedated and put on ventilator. After about a week, Duane was showing signs of improvement. The doctors were planning on removing the ventilator. But, when I was sitting with him in ICU, I noticed there was blood coming from his tube. The doctors rushed in and told me to leave the room. I could see that there was a lot going on. They had flattened out his bed and it looked like they were pounding on his chest. Duane had gone into respiratory failure. The doctors were unable to resuscitate him. He died on July 30, 2015. He never made it out of the hospital after the stem-cell transplant. Duane was my best friend, and I lost him. He was everything to me. I miss him every day.

Linda MacMenamie
LINDA MacMENAMIE

Sworn to before me this
12th day of July, 2022

Vickie D. Blocker
Notary Public

